REMARKS/ARGUMENTS

Claim 7 has been amended to correct informalities. Claims 17 and 28 to 30 were previously cancelled. The specification has been amended to correct the Office Action's objection to the specification containing an embedded hyperlink. No new matter has been added.

Claims 1 to 16, 18 to 27 and 31 to 34 are currently pending.

Objection to the Specification

In the Office Action, the Examiner objected to the disclosure for containing an embedded hyperlink and/or other form of browser-executable code. The specification has been amended to delete the embedded hyperlink and/or other form of browser-executable code. Withdrawal of the Examiner's rejection is therefore requested.

Claim Objection

Claim 7 was objected to for informalities. Claim 7 has been amended to correct the spelling of the term "utilizes". Withdrawal of the Examiner's objection is therefore requested.

Claim Rejections- 35 USC §103

Claims 1 to 16, 18 to 27 and 31 to 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Maurer, U.S. Patent No. 7,006,963, taken in view of Bleier et al., U.S. Patent No. 6,832,184.

The Maurer patent (U.S. Patent No. 7,006,963) describes "a method and system for simulating clients workstations at protocol stack level 2, the data link layer, in the layered network protocols." See Maurer, col. 1, lines 20 to 22.

The Bleier patent describes "a method and system for generating local area network ("LAN") traffic for multiple simulated client workstations." See Bleier, col. 1, lines 21 to 23.

Independent claims 1, 2 and 33 of the present invention recite:

1. A method for virtually simulating actual networked applications within a network simulation, comprising the steps of:

  providing a networked application code and a client interface which communicates with the network application code;

  providing a network simulator that simulates a network of communicating nodes;

  providing a server that interfaces to the network simulator, the server comprising functionality for establishment of a bidirectional mapping of communications of said networked application code to a simulated node in the network simulator;

  the client interface being aware of the server and communicating with the server over a network;

  the network simulator being able to interoperate with the server such that communication to the networked application code from the server appears to originate from the simulated node to which the networked application code is mapped; and

  modifying, via the client interface and the server, the networked application code by removing or inserting messages to or from simulated nodes.

2. A method for virtually simulating actual networked applications within a network simulation, comprising the steps of:

  initiating a server to interface to a network simulator;

  initiating a client interface to interface with the server over a network, the client interface communicating with a networked application code;

  bridging the networked application code via the client interface so that the network application code can communicate with the server;

  mapping the communications of the networked application code to a simulated node in the simulator, communication from the networked application code now appearing to originate from the simulated node; and

  insertion of and extraction of messages or packets from the networked application code to the simulated node, or from the simulated node to the networked application code, via the clients interface and the server.

33. A computer system for virtually simulating actual networked applications within a network simulation comprising:

a plurality of clients, each client having a client interface, the client interface communicating with an associated networked application code executing on the client;

a network simulator including a plurality of simulated nodes;

a server, the server having functionality for interfacing to the network simulator;

and wherein each client communicates with the server over a network,

and wherein each client executes the networked application code and the client interface so that the networked application code can communicate with the server,

and wherein the client interface maps the networked application code to one of the simulated nodes so that communication from the networked application code now appears to originate from the simulated node, and inserts and extracts messages or packets from the networked application code.

Applicants respectfully submit that the Maurer patent describes "a method and system for simulating clients workstations" and the Bleier patent describes "a method and system for generating local area network ("LAN") traffic for multiple simulated client workstations", however, neither the Maurer nor the Bleier patent disclose "virtually simulating actual networked applications within a network simulation" as recited in independent claims 1, 2 or 33 of the present invention. Applicants respectfully submit that both the Maurer and Bleier patents describe simulating clients for the purpose of load testing servers, which is not "virtually simulating actual networked applications within a network simulation" as recited in independent claims 1, 2 or 33 of the present invention.

The present invention 'projects' application software such that it appears to be operating on a simulated node in a network simulation. Neither the Maurer patent nor the Bleier patent show or teach network simulation as both Maurer and Bleier test servers such that the simulated client acts like a real one. The mimicking used to 'simulate' in both the Maurer patent and the Bleier patent is of application software, while in the present invention the simulation is of a network wherein actual network software (client, server, etc.) is projected as to seem to act on a simulated node. The present invention is not simulating client software at all, but making it 'appear' (unchanged) virtually in a network simulation. Therefore, Applicants respectfully submit that both the Maurer and Bleier patents fail to teach or show "the network simulator being able to interoperate with

the server such that communication to the networked application code from the server appears to originate from the simulated node to which the networked application code is mapped" as recited in claim 1 of the present invention. Similarly, both the Maurer and Bleier patents fail to show or teach "bridging the networked application code via the client interface so that the network application code can communicate with the server; mapping the communications of the networked application code to a simulated node in the simulator, communication from the networked application code now appearing to originate from the simulated node" as recited in claim 2 of the present invention. For the same reasons, both the Maurer and Bleier patents fail to show or teach "wherein the client interface maps the networked application code to one of the simulated nodes so that communication from the networked application code now appears to originate from the simulated node, and inserts and extracts messages or packets from the networked application code" as recited in claim 33 of the present invention.

Moreover, as admitted in the Office Action, Maurer fails to specifically disclose a client interface which communicates with the network application code. See Office Action, page 5, first full paragraph.

The Office Action then asserts that "Bleier discloses a client interface which communicates with the network application code (see col. 7, lines 53-61.)" See Office Action, page 5, second full paragraph.

The Bleier patent at col. 7, lines 53-61 states:
In the present invention, there is also provided one or more embedded protocol application modules ("PAMs") for allowing the actions of the application, e.g., web browser, to be simulated and allowing the handling of dynamic, application-related events. An API is provided between the tool and the PAM and between the PAM and the protocol stack to allow multiple applications to be simulated concurrently and to allow rapid development of new application support.
See Bleier patent, col. 7, lines 53-61.

Applicants respectfully submit that the cited reference to the Bleier patent does not "discloses a client interface which communicates with the network application code" as alleged in the Office Action. Specifically, Applicants note that the Bleier patent describes that:

> The simulator also includes one or more application programming interfaces ("APIs") for interaction between the various components of the tool and the protocol stack. The APIs allow the protocol stack to be replaced dynamically and/or to allow multiple simultaneous protocol stacks to be simulated dynamically.
>
> See Bleier. col. 7, lines 35 to 40.

Applicants respectfully submit that there is no teaching or suggestion that the API of the Bleier patent is "a client interface which communicates with the network application code."

Moreover, the Bleier patent describes that "Protocol Application Modules ("PAMs") simulate one or more running applications that generate requests for services to the server." See Bleier, col. 13, lines 62 to 65. Applicants respectfully submit that there is no teaching or suggestion that the PAMs of the Bleier patent are "a client interface which communicates with the network application code" as claimed in the present invention. Therefore, the assertion in the Office action asserts that "Bleier discloses a client interface which communicates with the network application code (see col. 7, lines 53-61.)" is unsupported as Bleier does not show or teach "providing a networked application code and a client interface which communicates with the network application code" as recited in claim 1, or "initiating a client interface to interface with the server over a network, the client interface communicating with a networked application code" as recited in claim 2 or "a plurality of clients, each client having a client interface, the client interface communicating with an associated networked application code executing on the client" as recited in claim 33.

Therefore, neither the Maurer patent nor the Bleier patent show or teach "providing a networked application code and a client interface which communicates with the network application code" as recited in claim 1, or "initiating a client interface to interface with the server over a network, the client interface communicating with a networked application code" as recited in claim 2 or "a plurality of clients, each client having a client interface, the client interface communicating with an associated networked application code executing on the client" as recited in claim 33.
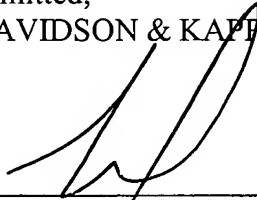
For the foregoing reasons, withdrawal of the Examiner's rejection of independent claims 1, 2 and 33 and dependent claims 3 to 16, 18 to 27 and 31, 32 and 34 is respectfully requested.

CONCLUSION

The present application is respectfully submitted as being in condition for allowance and applicants respectfully request such action.

Respectfully submitted,
DAVIDSON, DAVIDSON & KAPPEL, LLC

By:_____
                    Cary Kappel
                    Reg. No. 36,561

Davidson, Davidson & Kappel, LLC
485 Seventh Avenue, 14th Floor
New York, New York 10018
(212) 736-1940